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16 Attorneys for Defendants Hyundai Motor Co.,
17 Hyundai Motor America, Inc., Kia Motors Corp.,
18 and Kia Motors America, Inc.

19 UNITED STATES DISTRICT COURT
20 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

21 LESLIE FLAHERTY, JAMES
22 CARPENTER, MICA COLEMAN,
23 DANNY DICKERSON, ROBERT
24 FOCKLER, AMY FRANKLIN,
25 DONALD HOUSE, DAVE LOOMIS,
26 JOSEPH MCCALLISTER, ARRON
27 MILLER, RICKY MONTOKA, TRACI
28 MOORE, LYNN NORTH, MARK
RICE, REID SCHMITT, and JAMES
SMITH, individually, and on behalf of
all others similarly situated,

Plaintiffs,

vs.

HYUNDAI MOTOR COMPANY,
HYUNDAI MOTOR AMERICA, KIA
MOTORS CORPORATION, and KIA
MOTORS AMERICA, INC,

Defendants.

CASE NO. 8:18-cv-02223-JLS

**JOINT STATUS UPDATE AND
STIPULATION TO SET DEADLINE
TO RESPOND TO THE
COMPLAINT**

1 WHEREAS, Plaintiffs Leslie Flaherty, James Carpenter, Mica Coleman,
2 Danny Dickerson, Robert Fockler, Amy Franklin, Donald House, Dave Loomis,
3 Joseph McCallister, Arron Miller, Ricky Montoya, Traci Moore, Lynn North, Mark
4 Rice, Reid Schmitt, and James Smith filed their complaint in this matter on
5 December 14, 2018;

6 WHEREAS, on June 5, 2019, this Court stayed all deadlines pending
7 resolution of the motion to transfer and coordinate or consolidate pursuant to 28
8 U.S.C. § 1407 (ECF No. 34);

9 WHEREAS, the Court's order required a status update within 14 days
10 following the ruling by the Judicial Panel on Multidistrict Litigation ("JPML") on
11 the motion to transfer (*Id.*);

12 WHEREAS, the JPML denied the motion to transfer on July 29, 2019 (ECF
13 No. 35);

14 WHEREAS, the parties in the related action *In re: Hyundai and Kia Engine*
15 *Litigation*, Case No. 8:17-cv-00838-JLS-JDE (C.D. Cal.) previously reported to the
16 Court a settlement in principle, which is also joined by counsel in this action;

17 WHEREAS, the parties in this action and in *In re: Hyundai and Kia Engine*
18 *Litigation* have conducted confirmatory discovery relating to the proposed
19 settlement;

20 WHEREAS, the parties are finalizing the full settlement agreement and
21 anticipate presenting the proposed settlement with a motion for preliminary approval
22 to the Court within the next 30 days;

23 WHEREAS, the parties share an interest in advancing this matter as
24 efficiently and expeditiously as possible and are mindful that a settlement agreement
25 that includes Plaintiffs in this action would obviate the need for Defendants to
26 respond to the Complaint in its present form;

27 WHEREAS, the parties request that the Court reset Defendants' deadline to
28 respond to the Complaint to November 10, 2019.

1 NOW THEREFORE, Plaintiffs and Defendants hereby agree and stipulate as
2 follows:

3 The deadline for Defendants HMC, HMA, KMC, and KMA to respond to the
4 Complaint is November 10, 2019.

5
6 IT IS SO STIPULATED.

7 DATED: August 9, 2019

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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9
10 By /s/ Shon Morgan
11 Shon Morgan
12 *Attorneys for Defendants Hyundai Motor*
13 *Co., Hyundai Motor America, Inc., Kia*
14 *Motors Corp., and Kia Motors America,*
15 *Inc.*
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1 DATED: August 9, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

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ECF ATTESTATION

I, Shon Morgan, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the e-filing of the foregoing document in compliance with Local Rule 5-4.3.4(a)(2).

By /s/ Shon Morgan
Shon Morgan